

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Slayden Post Office  
(Slayden, TN)

Docket No. A2012-54

PUBLIC REPRESENTATIVE REPLY COMMENTS  
(January 17, 2012)

The Public Representative (PR) would ask the Commission to evaluate evidence in the Administrative Record (AR) showing community concerns and those on fixed-incomes, having limited resources and no alternatives, were discounted. Given a number of Slayden citizens who lack any transportation, the burden to obtain complete retail and delivery mail services anywhere for a financially disadvantaged group would be too great for some members in this community. The Postal Service appears to have misinterpreted and/or miscalculated the economics savings and workload in an attempt to completely discontinue the Slayden Post Office. For these reasons, the PR would respectfully ask the Commission to critically evaluate the reference materials at hand, the AR and the Postal Service comments in context of the "legal harmonization" revisions underway.<sup>1</sup>

## Procedural Issues

### Background

Months before Slayden's discontinuance process began under one set of rules (PO-101 Handbook of Discontinuance Procedures, 2004 version); the Postal Service had already begun the process of revising these very same rules (PO-101 Handbook, 2011 version published in July).<sup>2</sup> In the past, the technical definition of a "Post Office" was defined as an independent organizational unit headed by a "Postmaster."

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<sup>1</sup> The PR prepared her comments referencing the Postal Operations Manual (POM), PO-101 Handbook of Discontinuance Procedures (2004 and 2011 versions), and the Post Office Organization and Administration, Part 241-Establishment Classification, and Discontinuance (39 C.F.R. Sec. 241.1-Post offices and Sec. 241.3-Discontinuance of post offices, proposed and final rules.)

<http://www.gpo.gov/fdsys/pkg/FR-2011-03-31/pdf/2011-7555.pdf>

<http://www.gpo.gov/fdsys/pkg/FR-2011-07-14/html/2011-17529.htm> The staffing change states that a Postmaster does not need to be in charge of an independent post office; it can be managed by any postal employee.

<sup>2</sup><http://www.prc.gov/Docs/74/74154/USPS%20Handbook%20PO-101%20USPS-LR-N2011-1-1.pdf>

The discontinuance steps (and supporting materials, Postal Service forms on which the Slayden Final Determination was based, directly align and are intended to be used with the older technical definition of a Post Office-headed by a Postmaster).<sup>3</sup>

### **Economic Savings Analysis**

The Postal Service appears to have miscalculated the workload and savings calculation. If portrayed accurately, it would appear that the workload data only shows that the Slayden Post Office should have a part-time, not full-time Postmaster (and would not be discontinued). *Id.* The Postal Service used the full-time EAS-11 Postmaster salary from the last evaluation, rather than the current (presumably lower part-time Postmaster salary-EAS-E) to calculate savings. Slayden's workload score value of 114 simply means that the workload is now in the Postmaster 6-hour service category, not Full-Time (EAS-11 level). The Postmaster 6-hour service level is the highest part-time level workload shown in the PO-101 Handbook of discontinuance procedures. This Postmaster workload shift to a lower EAS level in and of itself would not seem to support complete discontinuance. Supporting AR evidence has been included and follows for convenience of review.

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<sup>3</sup> <http://www.prc.gov/Docs/63/63880/Handbook%20PO%20101.pdf>

**Worksheet for calculating Workload Service Credit (WSC) for Post Offices**

Office Name: SLAYDEN  
 Office Zip+4: 37165 -9998 District: TENNESSEE PFC

**Activity WSCs**

General Delivery Families Served (Item 3, PS Form 150) .....	0	X 1.0	=	0
Post Office Boxes/Call Boxes Rented (Item 4, PS Form 150) .....	68	X 1.0	=	68
Possible City Deliveries (Item 5, PS Form 150) .....	0	X 1.33	=	0
Administrative Rural Boxes Served (Item 6, PS Form 150) .....	0	X 1.0	=	0
Intermediate Rural Boxes Served (Item 7, PS Form 150) .....	0	X 0.7	=	0
Administrative Responsibility for Intermediate Rural Boxes for Other Offices (Item 8, PS Form 150) .....	0	X 0.3	=	0
Administrative Highway Contract/Star Route Boxes Served (Item 9, PS Form 150) .....	0	X 1.0	=	0
Intermediate Highway Contract/Star Route Boxes Served (Item 10, PS Form 150) .....	0	X 0.7	=	0
Administrative Responsibility for Intermediate Highway Contract/Star Route Boxes for Other Offices (Item 11, PS Form 150) .....	0	X 0.3	=	0
<b>Total Activity WSCs</b> .....				<b>68</b>

**Revenue WSCs**

<b>Total Revenue</b>		<b>25578</b>			
First	25 revenue units: 1.00	X	25 units	=	25.00
Next	275 revenue units: 0.50	X	42 units	=	21.00
Next	700 revenue units: 0.25	X	0 units	=	0.00
Next	5000 revenue units: 0.10	X	0 units	=	0.00
	Balance of revenue units: 0.01	X	0 units	=	0.00
<b>Total revenue WSCs:</b>					<b>46.00</b>

Activity WSCs 68 + Revenue WSCs = 46.00 Base WSCs 114.00 = EAS Grade E

Previous evaluation: EAS grade 11  
 Previous Year Revenue 08 25191  
 Previous Year Revenue 07 21824

Effective date of change in service hours: \_\_\_\_\_ (if appropriate)  
 (when a vacancy exists, hours must reflect the appropriate EAS grade)

Worksheet completed by:

REBECCA PURSLEY	REBECCA.L.PURSLEY@USPS.GOV
Printed Name	Signature
TENNESSEE PFC District Review Coordinator	11/30/2010
Title	Date

Exhibit 222c (p. 3)  
**Workload Service Credit Ranges**

Grade EAS	Service Hour Category	Zone of Tolerance**	WSC Range*	Zone of Tolerance**	Lower Grade	WSCs Required to Raise Grade
A	2 hr	-----	1-40	41-45	-----	46
C	4 hr	36-40	41-82	83-93	35	94
E	6 hr	73-82	83-125	126-141	72	142
11	Full-time	111-125	126-335	336-376	110	377
13		298-335	336-820	821-914	297	915
15		736-820	821-2,075	2,076-2,291	735	2,292
18		1,869-2,075	2,076-5,500	5,501-6,049	1,868	6,050
20		4,951-5,500	5,501-13,000	13,001-14,299	4,950	14,300
21		11,701-13,000	13,001-26,000	26,001-28,599	11,700	28,600
22		23,401-26,000	26,001-68,200	68,201-75,020	23,400	75,021
24		61,381-68,200	68,201-167,200	167,201-183,919	61,380	183,920
26		150,481-167,200	167,201 and up	-----	150,480	-----

\*WSC Range: Applies in ranking Post Offices with vacant postmaster positions.

\*\*Zone of Tolerance: Applies in ranking Post Offices with incumbent postmasters. A Post Office with an incumbent postmaster will not change grade unless (1) the WSCs fall below or exceed the Zone of Tolerance WSCs for the current grade; or (2) the WSCs fall within the Zone of Tolerance for the current grade and have consistently remained within the Zone for 2 years, which must be documented. The 2-year waiting period begins when a PS Form 150, *Postmaster Workload Information*, substantiating the operational changes, is prepared by the postmaster and is received and verified by the district manager, Customer Service and Sales.

The PRC has seen variety in the type of employee appointed during the discontinuance review (Postmaster vacancy reason for review). The PRC has encouraged the Postal Service to use actual staff costs, rather than the “forward-looking” (full-time) Postmaster salary.

The Slayden community given their lack of transportation, financial resources and limited service alternatives would have been better served by retaining the Post Office and reducing service hours to part-time. The annual lease is quite low (\$2,880) and the revenue units shown from the walk-in revenue alone would likely make this Post Office not operate at a deficit with part-time service hours (there is even **additional actual revenue** from the 68 box holder fees).

The Postal Service continues to justify their economic savings calculation as “forward-looking” during a legal “harmonization” context while these rules were being changed. In addition, for Slayden’s calculation, the savings appear to be incorrectly calculated on the prior EAS-11 level from the last evaluation, not on the current presumably lower EAS-E Postmaster salary level.<sup>4</sup>

<sup>4</sup> <http://www.prc.gov/Docs/63/63880/Handbook%20PO%20101.pdf>  
<http://www.gpo.gov/fdsys/pkg/FR-2011-03-31/pdf/2011-7555.pdf> (Proposed rule finalized in July 2011)  
<http://www.gpo.gov/fdsys/pkg/FR-2011-07-14/html/2011-17529.htm>  
 USPS-LR-N2009-1/3, USPS Handbook PO-101, Post Office Discontinuance Guide (August 2004)  
<http://www.prc.gov/Docs/63/63880/Handbook%20PO%20101.pdf>

An accurate depiction of the workload results shows a part-time service Post Office, not discontinuance. The petitioner also points to several periods in the past when the Slayden Post Office was staffed by a part-time Postmaster. In the late 60's and 70's, the petitioner recalls the Post Office being open 2 hours in the morning and 2 hours in the afternoon.

The Postal Service believes it is only responsible for:” [formulating a specific proposal and evaluating it in the context of Title 39 U.S. Code.]” and does not evaluate the petitioner’s proposal for part-time service rather than complete discontinuance. The PR given the information at hand believes the Postal Service proposal savings calculations appear incorrect (and wouldn’t be considered a valid “specific proposal.”)

### **Effective and Regular Service**

The Postal Service reply comments include “the variety of delivery and retail options” as one reason in support of the Final Determination (USPS Reply Comments at 4).<sup>5</sup> There are no retail options in Slayden and no access to complete full retail and delivery services to a portion of the community who don’t have transportation, are on fixed-incomes and couldn’t be expected to walk the distance on roads and terrain not intended for pedestrians (see AR pdf document pages from survey respondents at pdf pp. 75, 79, 88, 103, 105, 145).<sup>6</sup>

Several Slayden street-view<sup>7</sup> maps publically available illustrate the (lack of) “variety” of delivery and retail services. The Postal Operations Manual (POM) states: “Post Offices are established to ensure that **complete** postal services are available to **all** customers in a community within specified boundaries of a named geographic place.” (POM 123.11, emphasis added).<sup>8</sup> The rural route carrier does not provide full packaging or special services and by itself would not provide complete services.

Completely discontinuing the Slayden Post Office surely would not give complete services to all members in Slayden. A photo of the Slayden Post Office is shown below.

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USPS-LR-N2011-1/1 - United States Postal Service Handbook PO-101 (July 2011)

<sup>5</sup> The Commission can check (lack of) nearby Post Offices, mailing, retail and shipping services by using the white pages search engines found online:

<http://www.whitepages.com/business?key=post++offices&where=Slayden%2C+TN>

<sup>6</sup> Sections of the AR paper copied pdf document do not contain page numbers. The PR references the survey responses by PDF page number.

<sup>7</sup> Google Maps with Street View lets you explore places around the world through 360-degree street-level imagery. These are actual Slayden street view photos.

<sup>8</sup>Postal Operations Manual, Issue 9 [http://www.nalc.org/depart/cau/pdf/manuals/POM/POM\\_9--12\\_08.pdf](http://www.nalc.org/depart/cau/pdf/manuals/POM/POM_9--12_08.pdf)

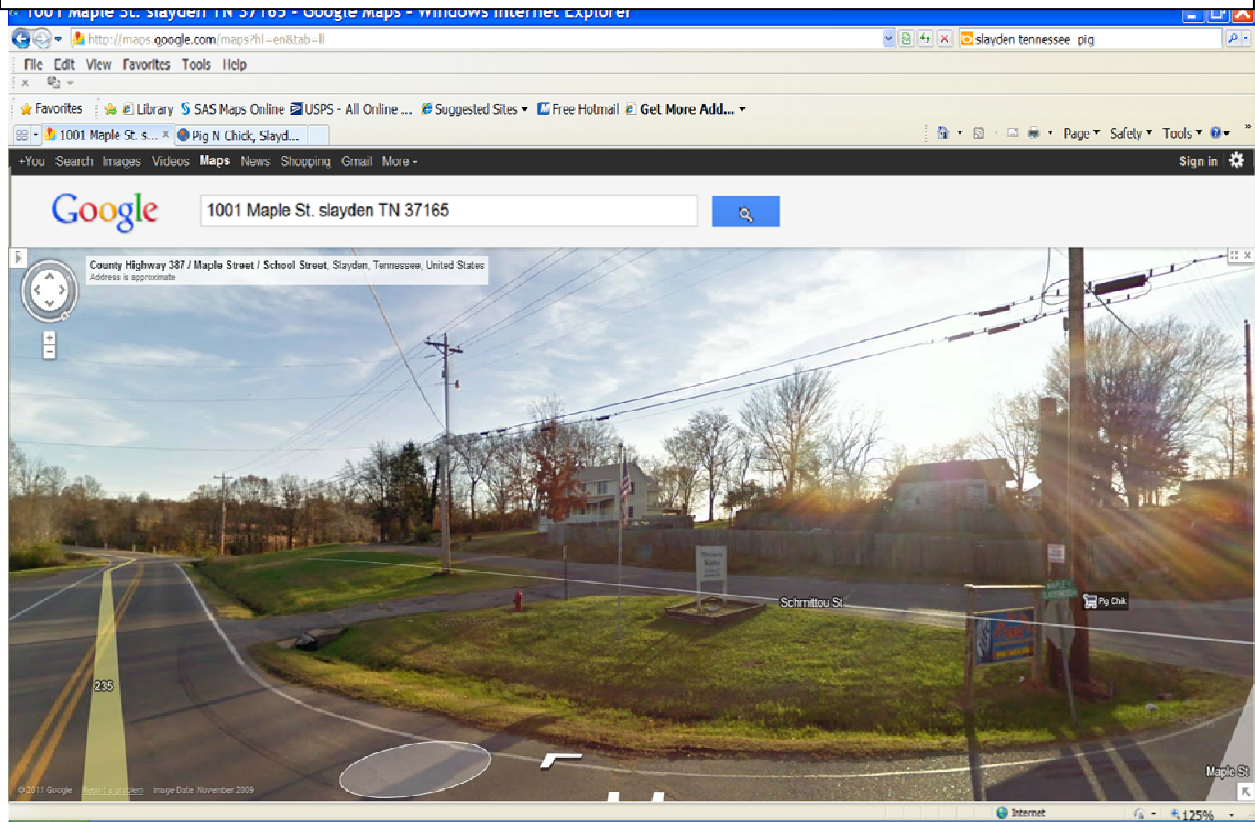


Google Maps accessed January 13, 2012<sup>9</sup>

<sup>9</sup> <<http://maps.google.com/maps?q=2830+Slayden-marion+rd+slayden+tn+37165&hl=en&ll=36.295524,-87.470395&spn=0.000277,0.164795&sll=36.295543,-87.470375&layer=c&cbp=13,355.69,,0,14.76&cbll=36.295524,-87.470395&hnear=2830+Slayden-Marion+Rd,+Slayden,+Tennessee+37165&t=m&z=13&vpsrc=0&panoid=ga30JT7A2VHjKevseXEoZg>>



Another Slayden street view is shown below. The only full service retail and mail services are provided by the Slayden Post Office, note “sidewalk” space for 5.1 mile walk to the closest other Post Office (Mauldin).



Google Maps accessed January 13, 2012<sup>10</sup>

## Other Concerns

There are areas in the AR with conflicting information and some, appear to conflict with the Postal Service Reply Comments. The AR Consolidation Proposal reverses (?) the order of the window walk-in revenue, making it look as if the revenue between 2008 and 2010 has decreased (AR pdf page 31). The Postal Service Reply Comments (at 2) show a reverse trend and walk-in window revenue steadily increasing between 2008 and 2010 (\$21,824; \$25,191; and \$25,578).

The Postal Service responses do not completely address the community concerns and present conflicting information. The PR is concerned that a ZIP code change is being imposed on Slayden for what may be convenience reasons. The Postal Service told the Slayden community their ZIP code will change due to ‘911 addressing requirements.’ Other Post Office Appeals have not changed ZIP codes due to “911 addressing requirements.”

<sup>10</sup> <http://maps.google.com/maps?daddr=slayden+TN&hl=en&ll=36.294811,-87.470288&spn=0.070852,42.1875&sll=37.614231,-83.276367&sspn=18.862462,42.1875&vpsrc=0&mra=ls&t=m&z=5&iwloc=ddw1&layer=c&cbll=36.294811,-87.470288&panoid=8zgNWLqCRB8S4Z9rEZxtAw&cbp=12,181.36,,0,0>

The Code of Federal Regulations (CFR) states to the extent possible and where practical, the community name and ZIP code should be retained. See *Preservation of Community Address* (39 C.F.R. 241.3(a)(3)(ii)(b)(1)) and *Zip Code Assignment* (39 C.F.R. 241.3(a)(3)(ii)(b)(2)). The petitioners (including the Mayor and Town Council) state that they will lose their community name and zip code if the Slayden Post Office is discontinued (*Petition for Review received from Mayor Harrison and Town of Slayden*, Docket A2012-54 at 4).

The PR would respectfully ask the Commission to critically discern the true meanings of the economics savings materials and the existing conflicting information and remand the Final Determination for further consideration.

Respectfully submitted,

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